

Delaware Co IBI

GENERATOR - RCRA INSPECTION REPORT

EPA ID IND 206049456 NAME Mid-City Plating Co., Inc.

MAILING ADDRESS: 921 East Charles Street, Muncie, Indiana
47305

LOCATION ADDRESS: Same

CONTACT: Rodney Muzzarelli PHONE 765/289-2374

OWNERSHIP: private COUNTY: 765/289-2374

STATUS CODE: 1 1=Active 3=Dead Mail 4=Non-notifier
2=Obsolete 6=Non-handler 9=Superfund
5=Out-of-business

ACTIVITY: (This should reflect the actual functioning of the facility)

LQG ☒ SQG ☐ CEG ☐ TRANSPORTER ☐ TSD ☐ UI ☐

TRANSPORTERS: Air ☐ Rail ☐ Hwy ☐ Water ☐ Other ☐

HAZARDOUS WASTE FUEL: Gen Mktg Burner ☐ Other Mkter ☐ Burner ☐
OFF SPEC USED OIL FUEL: Gen Mktg Burner ☐ Other Mkter ☐ Burner ☐
SPEC USED OIL FUEL MKTR: ☐
BURNING DEVICE: Util Boiler ☐ Indus Boiler ☐ Indus Furn ☐

Person(s) Interviewed: Title: Telephone:
Rodney Muzzarelli Env. Coordinator/owner 765/289-2374

Inspector(s) Title: Telephone:
John P. Naddy Environmental mgr. 317/233-1505

Chris Halloran Environmental mgr. 317/232-8552

Date of inspection: 4-16-97 Time of inspection: 9:00 a.m.

The Indiana Hazardous Waste Rules, 329 IAC 3.1, incorporates by reference federal standards which have been published in the Code of Federal Regulations as 40 CFR 260 through 40 CFR 270. Citations contained in this inspection form reference the federal rules as of July 1, 1995, except where the State rule substitutes full text language, in which case the specific 329 IAC 3.1 citation will be used.

A. GENERAL INFORMATION

- 1) Does this facility have any processes or activities which require a permit or Interim Status? If so, please list those activities by code or description below IC 13-30-2-1(9)

NO

2) Verify EPA I.D. No. IND 006049456 (HWIMS 090)

3) Type of Facility (G, T, TSD) based on inspection Large Quantity Generator

4) Type of Operation, Products Manufactured, Processes Utilized,
Size of Operation. Concentrate on processes that produce waste
(hazardous or non-hazardous)!

The facility is a zinc electroplating company. The
facility uses zinc cyanide and zinc alkaline electroplating
operations. The facility generates F006 sludge, F003
waste, D007 waste and non-hazardous used oil.

5) Hazardous Waste Stream/EPA #	Source	Rate	Disposition	LDR Treatability Group (WW/NWW)
<u>F006</u>	<u>WW pretreatment</u>	<u>20yd³/wk</u>	<u>Envirotek</u>	<u>NWW</u>
<u>F003</u>	<u>Line Clean-out plating waste</u>	<u>varies</u>	<u>Cyanotech</u>	<u>NWW</u>
<u>F003/D007</u>	<u>"</u>	<u>varies</u>	<u>"</u>	<u>"</u>
<u>F003/D007</u>	<u>spent chromate</u>	<u>varies</u>	<u>Pollution Control</u>	<u>NWW</u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

- | | <u>YES</u> | <u>NO</u> | <u>NA</u> |
|---|------------|-----------|-----------|
| 6) Have both listed and characteristic waste codes been assigned, where a listed waste exhibits a characteristic? <u>40 CFR 268.9</u> | <u>✓</u> | <u>—</u> | <u>—</u> |
| 7) Does the facility handle any California List Wastes? (liquid hazardous waste with greater than 50 ppm PCB, greater than 134 ppm nickel, greater than 130 thallium, etc.) | <u>—</u> | <u>✓</u> | <u>—</u> |

8) List all solid wastes not listed in number 4 such as spent materials, sludges, byproducts, scrap batteries and scrap metals. Place the corresponding letter for each category next to each material found.

A = Spent Materials B = Sludge
 C = Byproducts D = Scrap Metals/Batteries
 E = Others

Letter	Waste	Process Generating Waste	Rate	Disposition
<u>A</u>	<u>used oil</u>	<u>maintenance</u>	<u>varies</u>	<u>off-site brokers</u>
<u>D</u>	<u>Scrap Steel</u>	<u>empty containers / scrap</u>	<u>varies</u>	<u>metal scrap / Hartford City.</u>

9) If the company claims a reuse or reclamation exemption, please include the following information: 40 CFR 261.2, 261.2, 261.4 or 261.6

Waste Type	Generation Rate	How reclaimed & by Whom	Quantity stored on Site
a. <u>N/A</u>	_____	_____	_____
b. _____	_____	_____	_____
c. _____	_____	_____	_____
d. _____	_____	_____	_____

10) If any of the wastes are managed in the manners listed below, please check those areas and utilize the appropriate appendices.

	<u>YES</u>	<u>NO</u>
a) Waste Oil Fuel	_____	<u>✓</u>
b) Hazardous Waste Fuel	_____	<u>✓</u>
c) Tanks	_____	<u>✓</u>
d) Container Management	<u>✓</u>	_____
e) Generator Accumulation	<u>✓</u>	_____

11) Hazardous Waste

<u>On-Site</u>	<u>Amount</u>	<u>How Stored</u>	<u>Comments</u>
<u>F006 Sludge</u>	<u><20 yds³</u>	<u>20 yds³ roll off</u>	<u>labeled, dated, closed</u>
<u>F008 Cleanout</u>	<u>110 gallons</u>	<u>55 gallon Dr</u>	<u>" " "</u>
<u>F008/D007</u>	<u>110 gallons</u>	<u>" " "</u>	<u>" " "</u>
_____	_____	_____	_____
_____	_____	_____	_____

12) Is the Biennial Report accurate? yes

13) List transporters used by the company

Enviro-tx

Cyanotech

14) Can the company document questionable waste streams are non-hazardous as claimed? yes

15) Note any non-RCRA violations (open dumping, dumping in city sewer without pretreatment program, OSHA, etc.) none observed

16) Additional Comments:

The facility is currently undergoing a closure. The Old Chrome Shop / Back Building is being closed as part of an existing / pending enforcement action. The Old Chrome Shop / Back Building is being used as the less than ninety day storage area for containerized waste. The Closure Plan has not been approved by the department and was not inspected.

- During the inspection, Food waste was observed on the floor behind the Jessup line. The waste was from an outside contractor that had recently worked on the cooling coil equipment. The spilled material was cleaned prior to the end of the inspection. See DOV #5

- Note of concern - During the inspection, the floor drains in the Drum Rinse Room (Area) that lead to the waste treatment area of the facility were clogged to a point where the flow was limited if not obstructed. At the time of the inspection, no waste was overflowing, but if a spill was to occur, the drain would not operate as required or designed. See DOV #6

B. LAND BAN TREATMENT STANDARDS

(HWIMS 700)

OK DF NI NA

1) Does generator dilute prohibited wastes to meet treatment standard criteria, or render them nonhazardous, as a substitute for adequate treatment? 40 CFR 268.3

NO — — —

2) Do treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? 40 CFR 268.9

✓ — — —

3) Does generator specify alternative treatment standards for lab packs? If yes, see 40 CFR 268.42(c)(2)

NO — — —

4) Does generator mix wastes with different treatment standards for a constituent of concern?

NO — — —

a. If yes, did generator select most stringent treatment standards?

— — — ✓

5) Does the generator handle any wastes with a LDR variance (national capacity, case-by-case, etc.)?

NO — — —

a. If yes, list the waste and variance. _____

C. ON-SITE TREATMENT

(HWIMS 700)

1) Does the generator treat wastes in 90-day tanks or containers? If NA, go to next section.

— — — ✓

2) Does the generator treat the wastes to meet appropriate treatment standards?

— — — ✓

a. If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted?
40 CFR 268.7(a)(4)

— — — ✓

3) Does the plan fulfill the following:

OK DF NI NA

a. Based on a detailed chemical and physical analysis of a representative sample

___ ___ ___ ✓

b. Contains information necessary to treat the wastes in accordance with LDR

___ ___ ___ ✓

4) Has the plan been filed with the Regional Administrator or IDEM?

___ ___ ___ ✓

5) Are characteristic wastes which have been rendered nonhazardous shipped to a solid waste facility?

___ ___ ___ ✓

a. If yes, is a notification and a certification for each shipment sent to the Regional Administrator (prior to 2/24/92) or IDEM?
40 CFR 268.9(d)(1) and 268.7(b)(5)

___ ___ ___ ✓

D. MANIFEST SYSTEM

(HWIMS 110)

1) For hazardous waste shipments to Indiana facilities (or hazardous waste shipments to states that do not supply manifests) has the generator used the Indiana Hazardous Waste Manifest?

329 IAC 3.1-7-4

✓ ___ ___ ___

2) Does the operator have copies of the manifest available for review?

40 CFR 262.40 (329 IAC 3.1-7-6)

✓ ___ ___ ___

3) Have manifests been retained for 3 years?

(40 CFR 262.40)

✓ ___ ___ ___

4) Examine manifests for shipments in past ^{2 years} ~~6~~ months. Indicate approximate number of manifested shipments during that period.

>50 ___ ___ ___

- 5) Do the manifest forms examined contain the following information? 40 CFR 262.21 (329 IAC 3.1-7-8)
- | | | | | |
|--|----------|-------------|-------------|-------------|
| a. Manifest Document Number? EPA ID No. + Unique 5 digit No.? | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
| b. Name, mailing address, telephone number, and EPA ID Number of generator? | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
| c. Name, telephone number (3.1-7-11) and EPA ID Number of Transporter(s)? | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
| d. Name, Address, telephone number (3.1-7-11) and EPA ID Number of designated permitted facility? | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
| e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)? | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
| f. The total quantity of waste(s) and the type and number of containers loaded? | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
| g. Required waste minimization certification? | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
| h. Required signatures? | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
| i. EPA hazardous waste numbers (3.1-7-11)? | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
| j. Handling Codes (3.1-7-11)? | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
| k. Additional waste numbers included in box J. | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
- 6) Is the designated facility an approved TSD facility?
- | | | | | |
|--|----------|-------------|-------------|-------------|
| | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
|--|----------|-------------|-------------|-------------|
- 7) Has the generator submitted copies of hazardous waste manifests to the Department within five (5) working days after shipping hazardous waste? (This requirement applies to both Indiana's and other states hazardous waste manifests). 329 IAC 3.1-7-6
- | | | | | |
|--|----------|-------------|-------------|-------------|
| | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
|--|----------|-------------|-------------|-------------|

8) Reportable exceptions:
40 CFR 262.42 (HWIMS 180)

OK DF NI NA

a. For manifests examined (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT receive a signed copy from the designated facility within 35 days of the date of shipment.

0

b. For manifests indicated in question (7a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Commissioner.

0

E. EPA IDENTIFICATION NUMBERS

OK DF NI NA

1) Has the generator received an EPA Identification Number prior to treating, storing, disposing of, transporting, or offering for transportation, hazardous waste? 40 CFR 262.12(a)

✓

2) Has the generator offered his hazardous waste to transporters or to TSD facilities that have received an EPA Identification Number?
40 CFR 262.12(c)

✓

F. INTERNATIONAL SHIPMENTS (HWIMS 190)

1) Has the installation imported or exported hazardous waste? 40 CFR 262.50
(If answered Yes, complete the following as applicable.)

 ✓

a. Exporting hazardous waste; has the generator:

i. Notified the administrator and OSHWM/IDEM in writing?

 ✓

ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?

OK DE NI NA

___ ___ ___ ✓

iii. Met the manifest requirements?

___ ___ ___ ✓

b. Importing hazardous waste; has the generator met the manifest requirements?

___ ___ ___ ✓

G. LAND BAN NOTIFICATION REQUIREMENTS (HWIMS 700)

1) Does the generator provide a notification to the TSD facility with each shipment, even if waste meets treatment standards? 40 CFR 268.7

✓ ___ ___ ___

2) Does the notification include the following: (if possible, make copies of, or record information from notification(s) that do not contain the necessary information) 40 CFR 268.7

a. EPA hazardous waste number

✓ ___ ___ ___

b. Treatment standards (for wastes other than F001-F005 and F039, treatment standards may be referenced by including sub-category, treatability group, and CFR sections and paragraph where treatment standards appear)

✓ ___ ___ ___

c. Where treatment standards is specified technology, applicable five-letter treatment code?

✓ ___ ___ ___

d. Manifest number

✓ ___ ___ ___

OK DF NI NA

e. If the waste meets treatment standards, or if alternate treatment standards for lab packs are specified, does it have proper certification statement?

✓ — — —

f. Waste analysis data, if available.

✓ — — —

3) Has the generator retained on-site a copy of all notices, certifications, waste analysis data, and other documentation produced pursuant to 268.7 for at least five (5) years? 268.7(a)(7)

— ✓ — —

see DOV
Item #1

H. RECORDKEEPING AND REPORTING

1) Has the generator made a proper hazardous waste determination for all solid wastes generated at the facility, including correct LDR treatability group and treatment standard? 40 CFR 262.11 and 40 CFR 268.7

✓ — — —

(HWIMS 100)

a. If DF, list below:

Assigned Classification

Correct Classification

b. Which of the following methods does the generator employ for waste determination?

(a) Knowledge of waste.

(b) Analysis. Specify TECP

- 2) Are all test results and analyses needed for hazardous waste determinations retained for at least three years?
40 CFR 262.40 (HWIMS 180)

yes

- 3) Has the generator submitted Biennial Reports as required? (329 IAC 3.1-7-14) (HWIMS 180)

OK DE NI NA

✓

I. WASTE MINIMIZATION

(HWIMS 100)

- 1) Does the generator have a written waste minimization plan?

✓

- a) If a written plan is not available, briefly describe the waste minimization program as presented by the company representative.

N/A - written plan available

OK DF NI NA

2) Does the Biennial Report include the required waste minimization information?
(329 IAC 3.1-7-14/IC 13-22-11)

✓ — — —

3) Note any discrepancies between the written or oral plan, and observed on-site waste minimization activities. none observed

J. PERSONNEL TRAINING RECORDS

1) Do personnel training records include: (HWIMS 130)

a. Job titles for the positions related to HWM
40 CFR 265.16(d)1

— ✓ — —

See DOV
Item 2

b. The name of the employees filling each job title? 40 CFR 265.16(d)1

— ✓ — —

c. Job descriptions including the required skills, education, or other qualifications and the duties of the personnel assigned to the position? 40 CFR 265.16(d)2

— ✓ — —

Check categories for which job titles/descriptions are available (please include the supervisors of each category in that category when reviewing documents).

Emergency coordinator__ Training coordinator__ Emergency response personnel__
Inspectors__ Material handlers__ Container labelers__ Manifesters__
Recordkeepers__

d. Description of both introductory and continuing training required for each job?
40 CFR 265.16(d)3

— ✓ — —

Describe in general the type of training program in use at the facility.

Descriptions of Types of Hazards, Types of Physical Hazards, Labels, MSDS

How Chemicals Hurt You, PPE, HAZ-Mat in work areas, Disposal & Contingency Plans

OK DF NI NA

See DOV
Item 2

e. Records of training required in (d)?
40 CFR 265.16(d)4

— ✓ — —

f. Did facility personnel receive the required training, including:

i) Classroom or on the job

— ✓ — —

ii) Within 6 months of hire

— ✓ — —

iii) Annual review of training?

— ✓ — —

g. Are all training records maintained for current personnel and for at least three years for former employees?
40 CFR 265.16(e)

✓ — — —

g.) Training Records for training that had been conducted
is kept on-site. Not all required training was
conducted.

2) Employee Training Checklist:

Track at least three employees through their training programs for the last three years. Include date and type of training received. Check against required training list provided by the facility.

a) Employee Name
Job Title
Training
Received

b) Employee Name
Job Title
Training
Received

c) Employee Name
Job Title
Training
Received

Neil Jefferies

Rodney Muzzarelli

Marc Muzzarelli

4-9-94 Haz Comm / Annual Generator Training / Safe Transportation Training

No update

No update

No update

DOV Item 2

K. CONTINGENCY PLAN AND EMERGENCY PROCEDURES
[as required by reference in 40 CFR 262.34]

1) Does the Contingency Plan contain the following information: (HWIMS 150)

a. The actions facility personnel must take to comply with 265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable)

☒ ☐ ☐ ☐

b. Arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to 265.52(c)?

☒ ☐ ☐ ☐

c. Names, addresses, and phone numbers of all persons qualified to act as emergency coordinators? 40 CFR 265.52(d)

☒ ☐ ☐ ☐

d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities? 40 CFR 265.52(e)

☐ ☒ ☐ ☐

See DOV
Item #3

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.) 40 CFR 265.52(f)

☐ ☒ ☐ ☐

See DOV
Item #4

OK DF NI NA

2) Emergency Coordinator: (HWIMS 150)

- a. Is the facility Emergency Coordinator identified?
40 CFR 265.52(d)

✓

- b. Is coordinator familiar with all aspects of site operation and emergency procedures?
40 CFR 265.55

✓

- c. Does Emergency Coordinator have the authority to carry out the Contingency Plan?
40 CFR 265.55

✓

L. PREPAREDNESS AND PREVENTION

[as required by reference in 40 CFR 262.34]

OK DF NI NA

- 1) Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?
40 CFR 265.37 (HWIMS 140)

✓

-
- 2) Are copies of the Contingency Plan available at the site and local emergency organizations?
40 CFR 265.53 (HWIMS 150)

✓

OK DF NI NA

3) Emergency Procedures

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 40 CFR 265.56?

(HWIMS 150)

____ _ _ _ ☒

4) Was the IDEM Emergency Response Section notified of all releases which threatened or could have threatened human health or the environment outside the facility?

24-hr. Emergency Response number 241-4336

____ _ _ _ ☒

MID-CITY PLATING CO., INC.

Railroad

Old Chrome Shop
Back Building

Exit

stripping
part line

North
Burr
line

South
Burr
line

Drum
Rinse Area

adulterate line

new
into
building

fresh
water
into

Misc
Storage
product
storage
Blue
Hopper (Food)

Scrap
Hopper

Water
Pollution
Control
spill pit

Jessup line

cooling
coil
residue food

Hacking

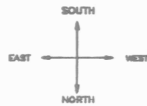
DATE	BY	REVISION	DESCRIPTION
10/10/88	J. J. J.	1	Initial Design
11/10/88	J. J. J.	2	Revised Design
12/10/88	J. J. J.	3	Final Design
01/10/89	J. J. J.	4	Construction
02/10/89	J. J. J.	5	Operation
03/10/89	J. J. J.	6	Maintenance
04/10/89	J. J. J.	7	Shutdown
05/10/89	J. J. J.	8	Restart
06/10/89	J. J. J.	9	Normal
07/10/89	J. J. J.	10	Emergency
08/10/89	J. J. J.	11	Test
09/10/89	J. J. J.	12	Final

SLUG PLAN

1

Charles St

--- CHROME/ACID RINSE WATER
--- GAS LINES
--- ALKALINE RINSE WATER



CONTAINER MANAGEMENT APPENDIX

(HWIMS 160/410)
40 CFR Part 265 as referenced by 262.34

Location/Description of Unit FOOL 20 yd³ Roll off North side of facility

	<u>OK</u>	<u>DF</u>	<u>NI</u>	<u>NA</u>
A. <u>GENERAL OPERATING REQUIREMENTS</u>				
1. Are containers in good condition? <u>(40 CFR 265.171)</u>	<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>
2. Are containers compatible with waste in them? <u>(40 CFR 265.172)</u>	<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>
3. Are containers managed to prevent leaks? <u>(40 CFR 265.173 (b))</u>	<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>
4. Are containers stored closed? <u>(40 CFR 265.173(a))</u>	<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>
5. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the property line? (Indicate if waste is ignitable or reactive). <u>(40 CFR 265.176)</u>	<u>—</u>	<u>—</u>	<u>—</u>	<u>✓</u>
6. Are incompatible wastes stored in separate containers? (If not the provisions of 40 CFR 265.17(b) apply) <u>(40 CFR 265.177(a))</u>	<u>—</u>	<u>—</u>	<u>—</u>	<u>✓</u>
7. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? <u>(40 CFR 265.177(c))</u>	<u>—</u>	<u>—</u>	<u>—</u>	<u>✓</u>
8. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? <u>(40 CFR 265.17(a))</u>				
a. Special handling?	<u>—</u>	<u>—</u>	<u>—</u>	<u>✓</u>
b. No smoking signs?	<u>—</u>	<u>—</u>	<u>—</u>	<u>✓</u>
c. Separation and protection from ignition sources?	<u>—</u>	<u>—</u>	<u>—</u>	<u>✓</u>

- | | OK | DF | NI | NA |
|---|----|----|----|----|
| 9. Does the container storage area have adequate aisle space? (40 CFR 265.35) | ✓ | — | — | — |
| 10. Are containers inspected weekly for leaks, deterioration, corrosion, or other factors? (40 CFR 265.174) | ✓ | — | — | — |

B. PREPAREDNESS AND PREVENTION

- | | | | | |
|---|---|---|---|-------|
| 1. Security - Do security measures include: (40 CFR 265.14) (TSD facilities only) (HWIMS 300) | | | | |
| a. 24-hour surveillance which continuously monitors and controls entry? | — | — | — | ✓ |
| b. Artificial or natural barrier around facility and controlled entry at all times? | — | — | — | ✓ |
| c. Danger sign(s) at entrance? | — | — | — | ✓ |
| 2. Has the facility been maintained and operated to minimize the possibility of a fire, explosion, or release of hazardous waste or hazardous waste constituent? (40 CFR 265.31) (HWIMS 140/340, 810 spill) | ✓ | — | — | — |
| 3. If required, does the facility have the following equipment: (HWIMS 140/340) | | | | |
| a. Internal communications or alarm systems? (40 CFR 265.32(a) and 40 CFR 265.34(a)) | ✓ | — | — | total |
| b. Telephone or 2-way radios at the scene of operations? (40 CFR 265.32(b)&40 CFR 265.34(b)) | ✓ | — | — | total |
| c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? (Please specify) | ✓ | — | — | — |

OK DF NI NA

- d. Water at adequate volume and pressure to supply water hoses, foam equipment automatic sprinklers or water spray equipment available? (Please specify) (40 CFR 265.32(d))

✓

4. Whenever waste is being handled do all personnel have immediate access to an alarm or communication device (thru another employee if always available)? (40 CFR 265.34(a))
(HWIMS 140/340)

✓

C. TESTING AND MAINTENANCE OF EMERGENCY EQUIPMENT
(HWIMS 140/340)

- 1.a. Has the owner or operator established testing and maintenance procedures for emergency equipment?
(40 CFR 265.33)

✓

- 1.b. Is the emergency equipment in operable condition?
(40 CFR 265.33)

✓

2. Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment?
(This applies to access for this equipment to reach hazardous waste management areas)
(40 CFR 265.35)

✓

Additional Comments:

GENERATOR ACCUMULATION APPENDIX
(HWIMS 120)

Location/Description of Unit E006 20 yd³ roll off north side of facility

OK DF NI NA

A. GENERAL OPERATING REQUIREMENTS

- 1) If waste is being shipped off-site is it properly packaged, labeled and marked per DOT regulations?

40 CFR 262.30-262.32

✓

- 2) Is the container clearly marked with the start of accumulation date?

40 CFR 262.34

✓

- 3) Has the generator accumulated hazardous waste on-site for 90 days or less?

40 CFR 262.34

✓

- 4) Do wastes remain in accumulation tanks for more than 90 days?

40 CFR 262.34

 ✓

- 5) Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?

40 CFR 262.34

✓

B. SATELLITE ACCUMULATION (HWIMS 120)

- 1) Are containers marked with the words "Hazardous Waste" or with other words identifying the contents?

40 CFR 262.34

- 2) Are containers in good condition, compatible with the wastes in them and stored closed?

40 CFR 262.34

CONTAINER MANAGEMENT APPENDIX

(HWIMS 160/410)

40 CFR Part 265 as referenced by 262.34

Location/Description of Unit Less than 90 Day container storage
Old Chrome Shop / Back Building

OK DF NI NA

A. GENERAL OPERATING REQUIREMENTS

- | | | | | | |
|----|--|----------|----------|----------|----------|
| 1. | Are containers in good condition? (40 CFR 265.171) | <u>✓</u> | <u>—</u> | <u>—</u> | <u>—</u> |
| 2. | Are containers compatible with waste in them? (40 CFR 265.172) | <u>✓</u> | <u>—</u> | <u>—</u> | <u>—</u> |
| 3. | Are containers managed to prevent leaks? (40 CFR 265.173 (b)) | <u>✓</u> | <u>—</u> | <u>—</u> | <u>—</u> |
| 4. | Are containers stored closed? (40 CFR 265.173(a)) | <u>✓</u> | <u>—</u> | <u>—</u> | <u>—</u> |
| 5. | Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the property line? (Indicate if waste is ignitable or reactive). (40 CFR 265.176) | <u>—</u> | <u>—</u> | <u>—</u> | <u>✓</u> |
| 6. | Are incompatible wastes stored in separate containers? (If not the provisions of 40 CFR 265.17(b) apply) (40 CFR 265.177(a)) | <u>✓</u> | <u>—</u> | <u>—</u> | <u>—</u> |
| 7. | Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? (40 CFR 265.177(c)) | <u>—</u> | <u>—</u> | <u>—</u> | <u>✓</u> |
| 8. | If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? (40 CFR 265.17(a)) | | | | |
| a. | Special handling? | <u>✓</u> | <u>—</u> | <u>—</u> | <u>—</u> |
| b. | No smoking signs? | <u>✓</u> | <u>—</u> | <u>—</u> | <u>—</u> |
| c. | Separation and protection from ignition sources? | <u>✓</u> | <u>—</u> | <u>—</u> | <u>—</u> |

- | | OK | DF | NI | NA |
|---|----|----|----|----|
| 9. Does the container storage area have adequate aisle space? (40 CFR 265.35) | ✓ | — | — | — |
| 10. Are containers inspected weekly for leaks, deterioration, corrosion, or other factors? (40 CFR 265.174) | ✓ | — | — | — |

B. PREPAREDNESS AND PREVENTION

- | | | | | |
|---|---|---|---|---|
| 1. Security - Do security measures include: (40 CFR 265.14) (TSD facilities only) (HWIMS 300) | | | | |
| a. 24-hour surveillance which continuously monitors and controls entry? | — | — | — | ✓ |
| b. Artificial or natural barrier around facility and controlled entry at all times? | — | — | — | ✓ |
| c. Danger sign(s) at entrance? | — | — | — | ✓ |
| 2. Has the facility been maintained and operated to minimize the possibility of a fire, explosion, or release of hazardous waste or hazardous waste constituent? (40 CFR 265.31) (HWIMS 140/340, 810 spill) | ✓ | — | — | — |
| 3. If required, does the facility have the following equipment: (HWIMS 140/340) | | | | |
| a. Internal communications or alarm systems? (40 CFR 265.32(a) and 40 CFR 265.34(a)) | ✓ | — | — | — |
| b. Telephone or 2-way radios at the scene of operations? (40 CFR 265.32(b)&40 CFR 265.34(b)) | ✓ | — | — | — |
| c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? (Please specify) | ✓ | — | — | — |

OK DF NI NA

- d. Water at adequate volume and pressure to supply water hoses, foam equipment automatic sprinklers or water spray equipment available? (Please specify)
(40 CFR 265.32(d))

✓

4. Whenever waste is being handled do all personnel have immediate access to an alarm or communication device (thru another employee if always available)? (40 CFR 265.34(a))
(HWIMS 140/340)

✓

C. TESTING AND MAINTENANCE OF EMERGENCY EQUIPMENT
(HWIMS 140/340)

- 1.a. Has the owner or operator established testing and maintenance procedures for emergency equipment?
(40 CFR 265.33)

✓

- 1.b. Is the emergency equipment in operable condition?
(40 CFR 265.33)

✓

2. Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas)
(40 CFR 265.35)

✓

Additional Comments:

GENERATOR ACCUMULATION APPENDIX
(HWIMS 120)

Location/Description of Unit ok Chrono Shop / Back Building 690 Day Storage Area

A. GENERAL OPERATING REQUIREMENTS

OK DF NI NA

- 1) If waste is being shipped off-site is it properly packaged, labeled and marked per DOT regulations?
40 CFR 262.30-262.32

✓

- 2) Is the container clearly marked with the start of accumulation date?
40 CFR 262.34

✓

- 3) Has the generator accumulated hazardous waste on-site for 90 days or less?
40 CFR 262.34

✓

- 4) Do wastes remain in accumulation tanks for more than 90 days?
40 CFR 262.34

 ✓

- 5) Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?
40 CFR 262.34

✓

B. SATELLITE ACCUMULATION (HWIMS 120)

- 1) Are containers marked with the words "Hazardous Waste" or with other words identifying the contents?
40 CFR 262.34

- 2) Are containers in good condition, compatible with the wastes in them and stored closed?
40 CFR 262.34

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

ON-SITE MANAGEMENT INITIATIVE--FY 97 APPENDIX

Concerns have risen over proper generator on-site management of RCRA wastestreams managed in exempt treatment/recycling processes. These processes include wastewater treatment and on-site recycling. In addition, various other exemptions exist including variances for recycled materials and site-specific excluded wastes. Concerns also exist regarding generator treatment in tanks and containers. This initiative will focus on these concerns and will help to develop guidance for compliance and technical assistance, as well as encourage pollution prevention methods to ensure best practicable management techniques for these processes/wastestreams.

FACILITY NAME: Mid-City Plating Co., Inc. SIC CODE: 3471
 CITY/STATE: Ellettsville / Indiana ZIP CODE: 47305 PHONE: 765/289-2374
 COUNTY: Delaware EPA IDENTIFICATION NUMBER: IND 006 049 456 INSPECTION DATE: 4-16-97
 CONTACT PERSON: Robney Muzzarelli INSPECTOR: J. NADDA

From the list below, indicate by a check any exempt process/wastestream or activity claimed by the generator:

- | | |
|--|---|
| <input checked="" type="checkbox"/> Wastewaters or units covered by Clean Water Act (40 CFR 261.4(a)(2)) or (40 CFR 265.1 or 264.1)) | <input type="checkbox"/> Reclaimed 2ndary materials returned to original process (40 CFR 261.4(a)(8)) |
| <input type="checkbox"/> Totally Enclosed Treatment Facility (40 CFR 264.1(g)(5) and 265.1(c)(9)) | <input type="checkbox"/> Deepwell Injection (40 CFR 264.1(d) and 265.1(c)) |
| <input type="checkbox"/> Elementary Neutralization (40 CFR 265.1 or 264.1)) | <input type="checkbox"/> Delisted Waste (40 CFR 260.22) |
| <input type="checkbox"/> Solvent Recovery (40 CFR 261.6(b),(c), and(d)) | <input type="checkbox"/> Case-by-case Exemption (40 CFR 260.30 and 260.40) |
| <input type="checkbox"/> Metals Recovery (reclaimed materials) (40 CFR 261.2) | <input type="checkbox"/> Wastes rendered non-hazardous (40 CFR 262.34 and 268.7(a)(4)) |
| <input type="checkbox"/> Use/reuse material (40 CFR 261.2(e) or (40 CFR 261.6(c) and(d))) | <input type="checkbox"/> Other |

GENERAL QUESTIONS:

What management units are involved in the exempt process(es)? CN⁻ destruction, pH adjustment tanks, metals precipitation, clarification settling sludge + dewatering

What hazardous wastes or hazardous constituents (if not a "waste") are managed in the exempt activity? spent cyanide and alkaline zinc plating solutions

What volume of hazardous wastes or constituents were managed in the exempt activity in 1996? 29,000,000
gallons

Is the facility within the regulatory guidelines (regarding the exemption claimed)? yes If not or status is questionable, explain: _____

Is there any signs of releases in or around the area(s) of concern? no If yes, identify area and explain: _____

WASTEWATER EXCLUSIONS:

If claiming a CWA exclusion, has facility submitted a one-time notification of hazardous waste discharge (for each hazardous waste code) to the POTW and to the IDEM Hazardous Waste Branch per 40 CFR 403.12(p)? yes

[If no, notify Office of Water Management and/or POTW]

Did the notification include the following:

- name of the hazardous waste ✓
- EPA waste code number ✓
- type of discharge (continuous, batch, other) ✓

Are hazardous wastes collected, stored, or treated before discharge? yes If yes, are they being managed under RCRA regulations? yes Explain, if necessary: if stored in containers managed as

C90 clay

If claiming a wastewater treatment exclusion, does the unit meet the definition of a tank/tank system (40 CFR 260.10)?

Are the exempted units inspected? yes If yes, how frequently? daily [If TSD, must inspect all SWMUs]

Is the system a closed loop system (i.e., no discharge)? no

[If no discharge, the unit is not exempt from RCRA under wastewater treatment exclusion]

If diluting ignitable (D001) wastes (other than High TOC Subcategory) or reactive(D003) wastes in the exempt units to remove the characteristic before land disposal, do they comply with 40 CFR 265.17(b)? N/A

(General requirements for ignitable & reactive wastes)

Are hazardous wastes generated by the wastewater treatment unit which are not part of the CWA discharge (e.g., WWT sludges/filtercake, filtered solids, etc.) managed under RCRA regulations? yes

RECYCLING EXCLUSIONS:

Can the facility demonstrate that there is a known market or disposition for the material? N/A

Has speculative accumulation occurred? If yes, describe:

Is the facility in compliance with subparts AA, BB, and CC? If no, explain

TREATMENT IN TANKS OR CONTAINERS:

What is the volume of hazardous waste treated, per batch? N/A Frequency of treatment?

Does the facility have a written waste analysis plan on file?

Has the plan been filed with IDEM?

Identify any **OTHER EXEMPTIONS** or **VARIANCES** claimed by the facility: N/A

Additional Comments:

+++++FAX

MID-CITY PLATING CO., INC.
921 E Charles Street
Muncie IN 47305
Tel: 765-289-2374
Fax: 765-289-2520

DATE: APRIL 17, 1997

PAGES: 4

TO: JOHN NADDY

FROM: Rod MUZZARELLI

COMPANY: IDEM

COMPANY: Mid-City PLATING

FAX#: 317-232-3403

FAX#: 765-289-2520

SUBJECT:

Message:

MISSING FORMS FROM ENVIRTE

If you HAVE ANY QUESTIONS PLEASE
CALL

Thank-You



STATE OF ILLINOIS

ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL

P.O. BOX 18276

SPRINGFIELD, ILLINOIS 62794-9276 (217) 782-6781

State Form UPC 62 8/81 ILS38-0610

HS
450FOR SHIPMENT OF HAZARDOUS
AND SPECIAL WASTE

Form Approved, OMB No. 2050-0036, Expires 9-30-99

PLEASE TYPE

(Form designed for use on elite (12 pitch) typewriter.)

EPA Form 8700-22 (Rev. 8-88)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. IND006049456		2. Page 1 of 1		Information in the shaded areas is not required by Federal law, but is required by Illinois law.	
3. Generator Name and Mailing Address Mid-City Plating Co Inc P.O. Box 6 Muncie, Indiana 47308		Location if Different 921 East Charles Street Muncie, Indiana 47305		A. Single Manifest Document Number 7090963		FEE PAID IF APPLICABLE	
4. 24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS 317-289-2374		5. Transporter 1 Company Name Envirte Corporation		B. Single Generator's ID 9, 18, 0, 35, 6, 72, 9		C. Single Transporter's ID 708-596-7040	
7. Transporter 2 Company Name		8. US EPA ID Number		D. Single Reporter's Phone 708-596-7040		E. Single Transporter's ID 708-596-7040	
9. Designated Facility Name and Site Address Envirte Corporation 16435 Center Avenue Harvey, Illinois 60426		10. US EPA ID Number ILD000666206		G. Single Facility's ID 0, 3, 11, 1, 10, 0, 0		H. Facility's Phone 708-596-7040	
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers		13. Total Quantity	
a. R.Q. hazardous waste solid NOS (F006) 9 NA3077 PGIII				No. Type		14. Unit Wt/Vol	
				0 0 1 CM 0 0 02 0			
b.							
c.							
d.							
15. Special Handling Instructions and Additional Information							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, and disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.							
Printed/Typed Name Mid-City Plating Co Inc/Rod Muzzarelli				Signature <i>[Signature]</i>		Date 11 12 96	
17. Transporter 1 Acknowledgement of Receipt of Materials				Signature <i>[Signature]</i>		Date 11 21 96	
Printed/Typed Name John Koehn				Signature <i>[Signature]</i>		Date 11 21 96	
18. Transporter 2 Acknowledgement of Receipt of Materials				Signature		Date	
Printed/Typed Name				Signature		Date	
19. Discrepancy Indication Space							
20. Facility Owner or Operator. Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.							
Printed/Typed Name Steven P. [Signature]				Signature <i>[Signature]</i>		Date 11 19 96	

This Agency is authorized to require, pursuant to Illinois Revised Statute, 1989, Chapter 111-1/2, Section 1004 and 1021, that this information be submitted to the Agency. Failure to provide this information may result in a civil penalty against the owner or generator not to exceed \$55,000 per day of violation. Violation of this information may result in a fine up to \$50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Waste Management Council.

LAND DISPOSAL
NOTIFICATION/CERTIFICATION
FORM - UTS

ENVIRTE

CORPORATION

Note: This form is used when treatment standards for constituents do not have to be specified.

CUSTOMER INFORMATION:

Generator Name: Mid-City Plating Co Inc Generator EPA ID#: IND006049456Pickup Address: 921 East Charles Street, Muncie, IndianaManifest Document # per Item 1 of Manifest: 000101 State Manifest Document #: 117090963Envirte Waste Stream per Manifest Item #: 11a. F006 11b. _____ 11c. _____ 11d. _____

MANIFEST ITEM NUMBER	DESCRIPTION OF WASTE		
	EPA HAZARDOUS WASTE NUMBER	TREATABILITY GROUP (Wastewater or Nonwastewater)	SUBCATEGORY (if applicable)
11a	F006	nonwastewater	

* The subcategories "Acid," "Alkaline," "Reactive Crystalline," and "Reactive Soluble" are described at 40 CFR 261.

SECTION 1: Restricted Wastes Requiring Treatment prior to Land Disposal

The purpose of this section is twofold: 1) to notify the designated facility specified on the referenced manifest that the subject waste does not meet applicable land disposal treatment standards set forth in 40 CFR 268 Subpart D (or exceeds the applicable prohibition levels set forth in 40 CFR 268.32 or RCRA section 3004(d)), and 2) to apprise the designated facility that, before being land disposed, the waste must be treated to comply with the applicable standards of 40 CFR 268 subpart D, 40 CFR 268.32, and RCRA 3004(d).

Printed Name: Mid-City Plating Co Inc Signature/Date: [Signature] 11/21/96
Rod Muzzarelli

SECTION 2: Restricted Wastes from Generators that Can be Land Disposed Without Further Treatment

The purpose of this section is twofold: 1) to notify the designated facility specified on the referenced manifest that the subject waste can be land disposed without further treatment; and 2) to certify that the waste meets the standards referenced above and does not exceed the applicable prohibitions set forth in 40 CFR 268 subpart D, 40 CFR 268.32, and RCRA section 3004(d).

I certify under penalty of law that I personally have examined and familiar with the waste through testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA 3004(d). I believe that the information I submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

Printed Name: _____ Signature/Date: _____

SEND ORIGINAL WITH SHIPMENT TO ENVIRTE - RETAIN COPY FOR YOUR FILES

RC-F-306 (rev.0 12/13/94)

LAND DISPOSAL
NOTIFICATION/CERTIFICATION
FORM - UTS

ENVIRITE

CORPORATION

Note: This form is used when treatment standards for constituents do not have to be specified.

CUSTOMER INFORMATION:

Generator Name: Mid-City Plating Co., Inc. Generator EPA ID#: IND006049456Pickup Address: 416 South Hackley Street, Muncie, Indiana 47305Manifest Document # per Item 1 of Manifest: 00092 State Manifest Document #: IL6464767Envirite Waste Stream per Manifest Item #: 11a. HS450 11b. _____ 11c. _____ 11d. _____

MANIFEST ITEM NUMBER	DESCRIPTION OF WASTE		
	EPA HAZARDOUS WASTE NUMBER	TREATABILITY GROUP (Wastewater or Nonwastewater)	SUBCATEGORY* (if applicable)
11a	F006	nonwastewater	
11a	D007	nonwastewater	

* The subcategories "Acid," "Alkaline," "Reactive Organics," and "Reactive Solvents" are described at 40 CFR 261.

SECTION 1: Restricted Wastes Requiring Treatment prior to Land Disposal

The purpose of this section is twofold: 1) to notify the designated facility specified on the referenced manifest that the subject waste does not meet applicable land disposal treatment standards set forth in 40 CFR 268 Subpart D [or exceeds the applicable prohibition levels set forth in 40 CFR 268.32 or RCRA section 3004(d)], and 2) to apprise the designated facility that, before being land disposed, the waste must be treated to comply with the applicable standards of 40 CFR 268 subpart D, 40 CFR 268.32, and RCRA 3004(d).

Printed Name: Mid-City Plating Co., Inc. Signature/Date: , 01/26/96
Rodney Muzzarelli

SECTION 2: Restricted Wastes from Generators that Can be Land Disposed Without Further Treatment

The purpose of this section is twofold: 1) to notify the designated facility specified on the referenced manifest that the subject waste can be land disposed without further treatment; and 2) to certify that the waste meets the standards referenced above and does not exceed the applicable prohibitions set forth in 40 CFR 268 subpart D, 40 CFR 268.32, and RCRA section 3004(d).

I certify under penalty of law that I personally have examined and familiar with the waste through testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA 3004(d). I believe that the information I submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

Printed Name: _____ Signature/Date: _____

SEND ORIGINAL WITH SHIPMENT TO ENVIRITE - RETAIN COPY FOR YOUR FILES

FACILITY NAME: Mid-City Plating Company, Inc.
PHOTOGRAPHER: John P. Naddy
DATE & TIME: April 16, 1997
OTHERS PRESENT: Ms. Christina Halloran (IDEM)
Mr. Rodney Muzzarelli (Mid-City)
LOCATION: 921 East Charles Street, Muncie,
Delaware County, Indiana.
SUBJECT: F008 waste on the floor at the east end of
the Jessup line.

Photo 1

FACILITY NAME: Mid-City Plating Company, Inc.
PHOTOGRAPHER: John P. Naddy
DATE & TIME: April 16, 1997
OTHERS PRESENT: Ms. Christina Halloran (IDEM)
Mr. Rodney Muzzarelli (Mid-City)
LOCATION: 921 East Charles Street, Muncie,
Delaware County, Indiana.
SUBJECT: The east end of the Jessup line where F008
waste had spilled on the floor. The waste had been
cleaned up prior to the completion of the inspection.

Photo 3

FACILITY NAME: Mid-City Plating Company, Inc.
PHOTOGRAPHER: John P. Naddy
DATE & TIME: April 16, 1997
OTHERS PRESENT: Ms. Christina Halloran (IDEM)
Mr. Rodney Muzzarelli (Mid-City)
LOCATION: 921 East Charles Street, Muncie,
Delaware County, Indiana.
SUBJECT: F008 waste on the floor at the east end of
the Jessup line.

Photo 2

**PREINSPECTION FILES AUDIT
CHECKLIST**

DATE: 2 / 5 / 97

BY: J. NADDOY

COMPANY: M.D. City Plating

LOCATION: 416 S. Hackley Street, Muncie, IN 47305, Delaware Co.

I.D. #: IND 1006 1049 1456

Type of Inspection: G---T---TSD---Closure---Complaint---Other (Please Specify)

A. GENERAL

	<u>YES</u>	<u>NO</u>	<u>NI</u>
1. Federal Notification on File	<u>X</u>	<u>---</u>	<u>---</u>
2. Federal Part A on File	<u>---</u>	<u>NA</u>	<u>---</u>
3. Closure Plan Reviewed	<u>X</u>	<u>---</u>	<u>---</u>
4. Contingency Plan Reviewed	<u>---</u>	<u>X</u>	<u>---</u>
5. Part B Permit Reviewed	<u>---</u>	<u>NA</u>	<u>---</u>
6. Part B Permit Reviewed (Note any Special Permit Conditions)	<u>---</u>	<u>NA</u>	<u>---</u>

Comments:

B. NOTIFICATION DATA (Notify type, waste codes listed, etc.)

Notification 8-8-80 F008, F009, P106, P121, D002 TSD

C. LAND DISPOSAL INFORMATION

1. List Waste and Land Disposal Facility

<u>---</u>	<u>---</u>
<u>---</u>	<u>---</u>
<u>---</u>	<u>---</u>

D. LIST POSSIBLE WASTE STREAMS NOT LISTED ON BIENNIAL REPORT

NA

E. LIST WASTE MANAGEMENT PRACTICES WHICH MAY REQUIRE A PERMIT

NA

F. FEDERAL PART A (Handling Codes), OR PART B PERMIT

	<u>Code</u>	<u>Amount</u>	<u>Unit of Measure</u>
1.	N/A		
2.			
3.			
4.			
5.			

G. CLOSURE/POST-CLOSURE Are there any closed units? If yes, describe:

closure of old chrome shop Container Storage Area
11 proceeds

H. COMPLIANCE BRANCH

List past two inspections and enforcement actions (CO, NOV, VL, WL)

Date of Inspection

12-17-92

Action Type

RES NOV - AO

Date of Action

AO signed 2-24-95

Approved 3-15-95

I. LIST UNRESOLVED ENFORCEMENT ACTIONS/VIOLATIONS

unresolved NOV/closure from 1992 inspection

J. BRIEFLY SUMMARIZE PREVIOUS VIOLATIONS (Note if they are repeats).

See 12-17-92 Inspection Report

K. LIST ANY ITEMS UNDER COMPLIANCE SCHEDULES WHICH ARE NOT YET COMPLETED OR NEED FIELD VERIFIED, INCLUDING WASTE MINIMIZATION REQUIREMENTS IN ENFORCEMENT ORDER AND SETTLEMENT AGREEMENTS.

L. COMMENTS



Indiana Department of Environmental Management

VERIFICATION OF INSPECTION

This is to verify that on April 16, 1997 an inspection of Mid-City

Plating Co., Inc. was

conducted by the undersigned representatives of the Indiana Department of Environmental Management, Office of Solid and Hazardous Waste Management. The inspection was conducted to determine compliance with the Resource Conservation and Recovery Act (RCRA), IC 13-22, and rules promulgated pursuant to those statutes.

A summary of violations and concerns noted during the inspection were verbally communicated to the undersigned company representatives during the inspection. The company is encouraged to correct deficiencies as soon as possible. Corrections made and verified during the inspection may still be cited as violations however, prompt action will be taken into consideration in determining the resolution to any enforcement action which may be taken.

Your company will be sent a preliminary summary file of the violations identified as a result of the inspection within forty-five (45) days of the inspection. The summary may identify violations not noted during the inspection if they surfaced as a result of a more extensive analysis of the rules or further review of records in the possessions of the Department. The company is encouraged to contact the inspector to clarify any misunderstandings which you believe may be reflected in the inspection summary.

IDEM: Printed Name	Signature	Position	Phone Number	Date
John P. Nassy	<i>John P. Nassy</i>	Environmental Manager	317/233-1505	4-16-97
Christina Halloran	<i>Christina Halloran</i>	Env. Mgr.	317 232-8552	4/16/97

Company: Printed Name	Signature	Position	Phone Number	Date
MID-CITY PLATING	<i>[Signature]</i>	OWNER	765-289-2374	4-16-97

Company Mailing Address

Description of Violations
Mid-City Plating Company, Incorporated
U.S. EPA ID Number: IND006049456
Inspection of April 16, 1997

1. Page 13

40 CFR 268.7(a)(7)

The generator failed to retain on-site copies of all notices, certifications, waste analysis data, and other documentation produced pursuant to 40 CFR 268.7 for at least five (5) years. Specifically, the generator was missing the Land Disposal Restriction notifications for hazardous waste manifests IL6464767 and IL7090963.

Copies of the missing Land Disposal Restriction notifications were obtained from the TSD by the generator and submitted via facsimile to the department on April 17, 1997.

2. Page 15
Page 16

40 CFR 265.16(d)

At the time of the inspection, the information required in the personnel training records was missing and the following violations were noted:

- The personnel training records did not include the job titles for the positions related to hazardous waste management.
- The personnel training records did not include the name of the employees filling each job title.
- The personnel training records did not include the job descriptions including the required skills, education, or other qualifications and the duties of the personnel assigned to the position.
- The personnel training records did not include the description of both introductory and continuing training required for each job.

At the time of the inspection, no training records for Marcia Muzzarelli, Alternate Environmental Coordinator, were available.

At the time of the inspection, the facility representative stated that no employees had received an annual review of training within the prior twelve months.

Action

The generator shall provide the required training to the personnel managing the hazardous waste on-site. This would include, but not be limited to, the production personnel handling hazardous waste, the waste treatment operator(s) managing the waste, and the personnel responsible for manifesting the hazardous waste offsite. Additionally, the aforementioned documentation must be available and on-site.

3. Page 17 40 CFR 265.52(e)
The generator failed to include a list of all emergency equipment at the facility in the site specific contingency plan. The list should include the location of each piece of equipment, a physical description of each item on the list and a brief description of its capabilities.

Action
The generator shall update and distribute the site specific contingency plan. The updated plan should be distributed to the local emergency agency, the state, the local fire and police departments and the local hospital.
4. Page 17 40 CFR 265.52(f)
The generator failed to include an evacuation plan for facility personnel in the site specific contingency plan. The plan must describe the signal(s) to be used to begin the evacuation, the evacuation routes and alternate evacuation routes.

Action
The generator shall update and distribute the site specific contingency plan. The updated plan should be distributed to the local emergency agency, the state, the local fire and police departments and the local hospital.
5. Page 7 IC 13-30-2-1
During the inspection, hazardous waste was observed on the floor behind the Jessup Plating Line. The facility representatives stated that the waste was an F008 waste generated by an outside contractor that had recently worked on the cooling coil equipment. The spilled hazardous waste was cleaned-up and properly containerized before the end of the inspection
6. Page 7 Note of Concern:
During the inspection, the floor drains in the Drum Rinse Area that lead to the waste treatment area of the facility were clogged to a point where the flow was limited if not obstructed. At the time of the inspection, no waste was overflowing, but if a spill was to occur, the drain would not operate as required or designed.

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

INDIANAPOLIS

OFFICE MEMORANDUM

Date: April 17, 1997

To: Mid-City Plating Co., Inc.
IND006049456
Muncie, Delaware County

Thru: Christina Halloran

From: John P. Naddy *JPN*
HW Compliance Section

Subject: Trip report for a site visit to conduct a Scheduled Compliance Inspection of the Mid-City Plating facility in Muncie, Indiana.

File Audit

The Mid-City Plating Company, Inc. facility is located in Muncie, Indiana. The facility notified the State and the U.S. EPA that it was generating hazardous waste. The facility is currently a large quantity generator (LQG) of hazardous waste.

The facility was previously inspected on December 17, 1992. The inspection revealed several violations and resulted in a monetary penalty and closure of an area where the containers had been stored. The facility is currently working with the Hazardous Waste Permit Section, of the department, to close the area of the facility used to store plating waste for greater than the allowed ninety days.

Investigation Findings

On April 16, 1997, Ms. Christina Halloran and I visited the aforementioned Mid-City Plating facility. The facility was open and operating at the time of the investigation. The facility was represented by Mr. Rod Muzzarelli; Vice President, Partial Owner, and Environmental Coordinator.

The facility address was previously 416 South Hackley Street, Muncie, Indiana. The facility expanded the building and moved the entrance to the side of the addition facing East Charles Street. Subsequently, the address of the facility was altered, but the physical location remained the same. The current address of the facility is 921 East Charles Street, Muncie, Indiana.

The facility is an electroplating company and operates five zinc electroplating lines. All five of the electroplating lines were operating at the time of the inspection. The facility has the ability to apply four different zinc plated finishes. The facility can plate a green, black, yellow, or clear zinc metal finish to steel stock.

Four of the electroplating lines use a process that involves cyanide and generates cyanide bearing waste. The fifth line was installed within the last eight months and operates using an alkali zinc plating process. The electroplating lines were identified as follows:

- Hanson Line - The Hanson line had recently been installed. This line is used to electroplate zinc without using a cyanide process. The electroplating line utilizes a cloth filter-bag that accumulates material that is handled as a plating sludge. This material is treated in the waste water pre-treatment and is incorporated into the F006 hazardous waste. The filter is cleaned approximately semiannually.
- Udyllite Line - The Udyllite line is a zinc electroplating line that utilizes a cyanide solution and generates a cyanide bearing waste. The line is used for medium size rack electroplating work. All materials are added to this line manually. Spent materials are pumped out and either containerized pending treatment or batch treated. The method of treatment will be based on the type and concentration of the spent solution.
- Jessup Line - The Jessup line is also a zinc electroplating line that utilizes a cyanide solution and generates a cyanide bearing waste. The line is used for medium to large rack electroplating work.
- North & South Barrel Lines - The North and South Barrel lines are used for zinc electroplating small items that either cannot be racked or cannot be racked economically. The two lines are identical and operate using a cyanide process.

All of the electroplating lines are hard piped to the wastewater pretreatment

The inspection revealed the following information:

- At the East end of the Jessup Line, staff observed an area of spilled F008 plating waste. The material had been spilled by a contractor servicing the plating line equipment. The material was dry and crusty. The material was cleaned up and containerized before the end of the inspection.
- An open hopper being used to collect F006 electroplating sludge was observed during the inspection. The hopper was receiving waste at the time of the inspection. The hopper was not labeled with the words "Hazardous Waste." The hopper was labeled before the end of the inspection. The volume of waste in the hopper was greater than fifty-five gallons and could not be considered a satellite accumulation container. The hopper is emptied approximately two times during each eight-hour shift.

- The training records were incomplete. There were no training records for Ms. Marcia Muzzarelli, the Alternate Environmental Coordinator. Additionally, the annual update training records for all of the employees were not available at the time of the inspection.
- A review of the manifests and accompanying Land Disposal Restriction paperwork revealed that the Land Disposal Restriction paperwork was missing for the following manifests:
 - Illinois Hazardous Waste Manifest IL7090963 (1-21-96)
 - Illinois Hazardous Waste Manifest IL6464767 (1-26-96)

The missing Land Disposal Restriction paperwork referenced above was submitted to this office via electronic facsimile on April 17, 1997.

An additional concern was stated by the inspectors at the time of the inspection. The trench, in the room with the barrel plating lines, that drains any spilled materials to the waste water treatment system, was at least partially clogged. The trench had no overflowed at the time of the inspection, but the trench did contain liquids which were not flowing freely to the waste water treatment area. Since the trench was still operating and (waste) liquids had not escaped the system, this was not cited as a violation.

Conclusions and Recommendations

The inspection revealed several hazardous waste violations. Excepting the personnel training, all of the violations have been corrected. A warning letter is recommended.

JPN

cc: Delaware County Health Department

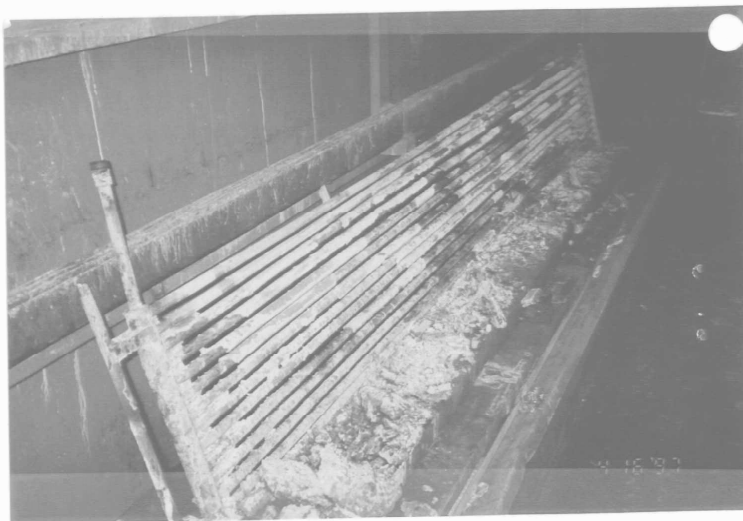
FACILITY NAME: Mid-City Plating Company, Inc.
PHOTOGRAPHER: John P. Naddy
DATE & TIME: April 16, 1997
OTHERS PRESENT: Ms. Christina Halloran (IDEM)
Mr. Rodney Muzzarelli (Mid-City)
LOCATION: 921 East Charles Street, Muncie,
Delaware County, Indiana.
SUBJECT: F008 waste on the floor at the east end of
the Jessup line.

Photo 1



FACILITY NAME: Mid-City Plating Company, Inc.
PHOTOGRAPHER: John P. Naddy
DATE & TIME: April 16, 1997
OTHERS PRESENT: Ms. Christina Halloran (IDEM)
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the Jessup line.

Photo 2



FACILITY NAME: Mid-City Plating Company, Inc.
PHOTOGRAPHER: John P. Naddy
DATE & TIME: April 16, 1997
OTHERS PRESENT: Ms. Christina Halloran (IDEM)
Mr. Rodney Muzzarelli (Mid-City)
LOCATION: 921 East Charles Street, Muncie,
Delaware County, Indiana.
SUBJECT: The east end of the Jessup line where F008
waste had spilled on the floor. The waste had been
cleaned up prior to the completion of the inspection.

Photo 3

